IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IHSAN AYYAD,)
Plaintiff) Case No. 16-C-10314
V.) Judge Harry D. Leinenweber
OGDEN MINUTEMAN, INC.) Mag. Judge Sidney I. Schenkier)
et al. Defendants.)

PLAINTIFF'S MOTION FOR ENTRY OF A FINAL JUDGMENT ORDER

Plaintiff, Ihsan Ayyad, respectfully moves for entry of a final judgment order. In support his motion, Plaintiff states:

- 1. On April 12, 2018, the Court entered summary judgment in favor of Plaintiff and against Defendants, jointly and severally, under the Fair Labor Standards Act ("FLSA") and Illinois Minimum Wage Law ("IMWL"), awarding Plaintiff a total of \$27,329.92 in damages.
- 2. Having secured complete relief on Counts I and II of his Amended Complaint, Plaintiff voluntarily dismissed Counts III and IV pursuant to Fed. R. Civ. P. 41(a)(2) at the hearing on May 24, 2018.
- 3. Judgment was not yet entered in this case, in order to facilitate negotiation of a payment agreement of the damages between parties. The payment agreement having now been reached, Plaintiff is filing this motion for entry of a final judgment order on the damages.

- 4. The judgment does not include Plaintiff's attorney's fees and costs under the FLSA and IMWL, which will be awarded in a separate final judgment order.
- 5. A proposed order is attached to this motion as Exhibit A. A copy of the proposed order is also being sent to the Court's proposed order email inbox.

Dated: June 25, 2018 Respectfully submitted,

<u>/s Samantha Kronk</u>
One of the Attorneys for Plaintiff

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